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Attorneys for Third-Party Defendant
SOUND PROPELLER SERVICES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GOLDEN GATE BRIDGE HIGHWAY
AND TRANSPORTATION DISTRICT, a
public entity; and LEXINGTON
INSURANCE COMPANY, a corporation,

Plaintiff,

vs.

Case No.: C10-2387 SC

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
TO COMPLETE ADR PROCESS**

1 BLUE AND GOLD FLEET, INC., a
2 California corporation; BLUE AND GOLD
FLEET, L.P., a Delaware limited
partnership,

3 Defendants.

4 AND RELATED CROSS-ACTION

5
6 WHEREAS pursuant to the Court's Order of January 18, 2011, the parties currently have
7 until April 22, 2011 to complete mediation;

8 WHEREAS Sound Propeller Services filed a Counter-Claim and Cross-Claim against
9 Blue & Gold Fleet, LP and Rolls Royce Naval Marine, Inc., Bird-Johnson Company on January
10 26, 2011;

11 WHEREAS the parties agree that the deadline to complete the ADR process should be
12 continued so as to allow the parties the opportunity to conduct discovery and engage in
13 settlement discussions;

14 IT IS HEREBY STIPULATED and agreed that the date by which to complete mediation
15 shall be extended four months from April 22, 2011, to August 22, 2011.

16 DATED: April 1, 2011

COZEN O'CONNOR

17 By /s/ Kevin D. Bush

18 Kevin D. Bush

19 Attorneys for Plaintiffs GOLDEN GATE BRIDGE
20 HIGHWAY AND TRANSPORTATION DISTRICT and
LEXINGTON INSURANCE COMPANY

21
22 DATED: April 1, 2011

EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP

23 By /s/ Talcott N. Bates

24 James J. Tamulski

Talcott N. Bates

25 Attorneys for Defendant and Third-Party Plaintiff BLUE &
26 GOLD FLEET, LP

1 DATED: April 1, 2011

LECLAIRRYAN LLP

2 By /s/ Peter M. Hart

Peter M. Hart

3 Attorneys for Third-Party Defendant ROLLS-ROYCE
4 NAVAL MARINE, INC. as successor to BIRD JOHNSON

5
6 DATED: April 1, 2011

GIBSON ROBB & LINDH LLP

7 By /s/ Geoffrey Robb

Geoffrey Robb

8 Attorneys for Third-Party Defendant SOUND PROPELLER
9 SERVICES, INC.

10 **CERTIFICATE OF SIGNATURES**

11 I, Talcott N. Bates, attest that the content of this document is acceptable to Kevin D. Bush,
12 Peter M. Hart, and Geoffrey Robb, and that they authorized me to sign the document on their
13 behalf.

14 By /s/ Talcott N. Bates

Talcott N. Bates

ORDER

Good cause appearing therefore, IT IS HEREBY ORDERED THAT:

The date by which to complete mediation shall be extended four months from April 22, 2011, to August 22, 2011.

DATED: 4/5/11

By The Hon. Judge Samuel Conti

